

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

AUG 25 2021

## UNITED STATES DISTRICT COURT

for the

Western District of Division

Roanoke Division

JULIA C. DUDLEY, CLERK  
BY: *ASingle*  
DEPUTY CLERK

Case No.

7-21-cv-00452  
(to be filled in by the Clerk's Office)

Wanda Moore

Plaintiff(s)

-v-

Safehome Systems, Inc.  
Board of Directors

Defendant(s)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR EMPLOYMENT DISCRIMINATION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Wanda Moore, Pro Se
Street Address	331 E Hawthorne Street
City and County	Covington
State and Zip Code	Virginia 24426
Telephone Number	540-691-5248
E-mail Address	Wandamoore83@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

**Defendant No. 1**

Name	Safehome Systems, Inc Board of Directors
Job or Title ( <i>if known</i> )	Janet Bryan, Board President
Street Address	PO Box 748/ 102 E Hawthorne Street
City and County	Covington
State and Zip Code	Virginia, 24426
Telephone Number	540-965-3237
E-mail Address ( <i>if known</i> )	

**Defendant No. 2**

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**Defendant No. 3**

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**Defendant No. 4**

Name	
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Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is

Name Safehome Systems, Inc.

Street Address PO Box 748

City and County Covington

State and Zip Code Virginia 24426

Telephone Number 540 965-3237

**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☐ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☒ Other federal law *(specify the federal law)*:

42 U.S.C. § 1981 A federal law prohibiting discrimination on the basis of race, color, and ethnicity when making and enforcing contracts. Section 1981 specifically grants all individuals within the US jurisdiction the same rights and benefits as "enjoyed by white

citizens" regarding contractual relationships (42 U.S.C. § 1981. Section 1981 applies to all private employers and labor organizations, but does not apply to discrimination by the US federal government as an employer

☐ Relevant state law *(specify, if known)*:

☐ Relevant city or county law *(specify, if known)*:

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☐ Retaliation.
- ☐ Other acts *(specify)*:

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)  
July 3, 2019

C. I believe that defendant(s) *(check one)*:

- ☐ is/are still committing these acts against me.
- ☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☒ race      Plaintiff was subject to discriminatory employment termination.
- ☐ color

- ☐ gender/sex \_\_\_\_\_
- ☐ religion \_\_\_\_\_
- ☐ national origin \_\_\_\_\_
- ☐ age (year of birth) \_\_\_\_\_ (only when asserting a claim of age discrimination.)
- ☐ disability or perceived disability (specify disability) \_\_\_\_\_

E. The facts of my case are as follows. Attach additional pages if needed.

Plaintiff's employment was terminated on July 3, 2019 by defendants (2 members of the board of directors) of Safehome Systems, Inc. After termination plaintiff filed a complaint of discrimination with the Department of Human Rights Civil Rights Division. Plaintiff was informed by DHR personnel that they were backlogged, therefore the case would not be assigned to an investigator anytime soon.

Plaintiff hired an attorney to reach a settle agreement. Spriggle Law Firm, Alexandria, Va. In July, 2020 the law firm accepted plaintiff's case. Retainer of 6,000.00, as well as ongoing fees close to \$7000.00 have been paid to the law firm. As the case moved forward, the demand letter was sent to the defendant in January of 2021 to which they never responded until June, 2021. Plaintiff's initial attorney was no longer employed with Spriggle. Plaintiff then had to change attorneys within Spriggle Law Firm.

Plaintiff's new attorney after working with the case initiated 3 letters to settle with the defendant for the amount in the demand letter. The defendant's attorney made 2 very low counter offers to my demand.

Plaintiff's fees to the law firm continued to increase. The law firm could no longer service plaintiff's case unless another 7000.00 was paid, which was not possible. Therefore, it was in the best interest of the plaintiff, based on the facts, to file the case in court and seek relief for damages. Please see the attachments for additional information.

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

#### IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

I filed with the Department of Human Rights

- B. The Equal Employment Opportunity Commission (check one):

has not issued a Notice of Right to Sue letter.

X issued a Notice of Right to Sue letter, which I received on (date) 08/18/2021 .

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment*

*Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (*check one*):

- ☐ 60 days or more have elapsed.  
☐ less than 60 days have elapsed.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

750,000.00

The termination by the defendants has placed plaintiff at a severe disadvantage. Plaintiff is a 55-year-old African American woman who had an excellent 30 year work history in the human service field. Plaintiff has educational degrees Associate, Bachelor, and Masters, but still has not found gainful due to the termination on her work history. Plaintiff briefly worked at another job, but that ended due to the pandemic. Plaintiff has had to explain to potential employers of the issues surrounding the termination, which has not resulted in a substantial job offer. Plaintiff is forced to continue her education to become licensed in the field that her master's degree is in. Plaintiff has exhausted all possible methods of dealing with the injustice of this case. It is of priority that the defendants be held accountable.

Lost of Salary \$60,000 x 3 years 180,000  
Cost of schooling 2021-2025- 120,000  
Replacement of Health coverage- 6,000.00  
Attorney Fees- 14,200.00  
Retirement Account/Mutual Fund-100,000.00  
Emotional Distress/Punitive Damages 330,000

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result

in the dismissal of my case.

Date of signing: 8/18/2021

Signature of Plaintiff

Printed Name of Plaintiff

Wanda Moore, Pro-Se

Wanda Moore

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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## **COMPLAINT**

Comes now, **Pro-se Plaintiff, Wanda Moore** of Covington, Va for complaint for damages against the defendants: SAFEHOME SYSTEMS(Governing Body)

### **Statement of Facts**

#### **Unequal terms and conditions of my employment.**

1. Plaintiff was promoted to the position of Executive Director for Safehome Systems, Inc. in October 2019. Plaintiff had been employed with the organization for 2 ½ years and had been promoted twice during her employment that led to this position. Plaintiff was the first African American Executive Director in the 30-year existence of the organization. During my tenure as Executive Director, I, Wanda Moore(hereafter known as the Plaintiff). plaintiff secured over \$550,000 in grant funding for operations of the organization and managed a staff of 14 and answered to the Board of Directors.
2. Plaintiff was the recipient of employment race discrimination, and unequal terms and conditions while employed in the position of Executive Director by the defendants. These conditions were in direct violation of 42 U.S.C. § 1981.
3. Defendant is a nonprofit organization that provides services to victims of domestic and sexual violence. The organization receives public support and its primary funding from the Virginia Dept of Criminal Justice. It is in direct violation for organizations that receive federal and state funding to discriminate against employees as well as those seeking services. The facts that can be presented in my case clearly show that 42 U.S.C. § 1981 has been violated.



### **Termination of employment**

4. Defendants (board president and a board member) terminated plaintiff on July 3, 2019, primary reason stated was for an issue that dealt with correcting a pay date that was listed incorrectly in the agency financial manual. This incorrect date did not correspond to the 7 years pay date history. Plaintiff made the correction and issued copies to the board of directors. The defendants alleged that the plaintiff "altered an agency document" which were grounds for immediate dismissal. However, 2 months before plaintiffs' termination 2 employees were involved in a physical altercation on agency premises which are grounds for immediate dismissal. The board created an addendum to the policy for these 2 employees. The 2 employees were given interim disciplinary actions in the form of 3-day suspension and the ability to sign a Performance Improvement Plan. The only way they would be terminated is if they refused to sign the PIP. Board President made a phone call to the Caucasian employee and a family member reassuring her that she would keep her job if she complied with what was set. Board President told plaintiff that it would "make the agency look bad" by immediately firing the Caucasian employee since she was notable in the community and court system. Plaintiff is of the African American race did not receive any such opportunities as the Caucasian and Latina employees for keeping job. This was in direct violation of 42 U.S.C. § 1981
5. Plaintiff made the appropriate filing with the Department of Human Rights and hired an attorney to try and settle the case out of court. However, the defendants were uncooperative in doing what is ethical and integral to bring this issue to a close and admit to their wrongful, discriminatory employment practices.

Wanda Moore, Pro-Se

*Wanda Moore Pro Se*

Wanda Moore  
331 E. Hawthorne St  
Covington, VA 24426

600-15351-009





Western District Court  
210 Franklin Rd. SW  
Roanoke, Va. 24011